

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR  
SYSTEMS PRODUCTS LIABILITY  
LITIGATION

Master File No. 2:12-MD-02327  
MDL 2327

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ETHICON WAVE 3 CASES LISTED IN  
EXHIBIT A TO PLAINTIFFS' NOTICE  
OF ADOPTION

JOSEPH R. GOODWIN U.S. DISTRICT  
JUDGE

**NOTICE OF ADOPTION OF PRIOR DAUBERT RESPONSE  
REGARDING CYNTHIA BERGMANN, M.D., FOR WAVE 3**

Plaintiffs filed a Notice of Adoption [Dkt. 2798] in the Wave 3 cases identified in Exhibit A to their Notice adopting their Motion to Exclude Certain Opinions and Testimony of Cynthia Bergmann, M.D. and Supporting Memorandum from Ethicon Wave 1. Defendants hereby adopt and incorporate by reference the *Daubert* response filed in relation to Cynthia Bergmann, M.D. for Ethicon Wave 1, Dkt. 2145. Defendants respectfully request that the Court deny Plaintiffs' motion for the reasons expressed in the Wave 1 response briefing.

Respectfully submitted,

ETHICON, INC., ETHICON LLC AND  
JOHNSON & JOHNSON

/s/ David B. Thomas

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**CERTIFICATE OF SERVICE**

I hereby certify that on this day, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ Christy D. Jones

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